

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

**JUNE MURPHY, individually and behalf of all
other similarly situated persons,**

Plaintiffs,

v.

**NORTHERN DUTCHESS PARAMEDICS,
INC., and EDWARD B. MURRAY,**

Defendants

11-CIV-5661 (LMS)

**NOTICE OF MOTION FOR PRELIMINARY APPROVAL OF CLASS SETTLEMENT
AND APPROVAL OF PLAINTIFFS' PROPOSED NOTICE OF SETTLEMENT**

For the reasons set forth in the Memorandum of Law in Support of Plaintiffs' Motion for Preliminary Approval of Class Settlement and Approval of Plaintiffs' Proposed Notice of Settlement, and in the Declaration of Matt Dunn in Support of Plaintiffs' Motion for Preliminary Approval, Plaintiffs respectfully request that the Court enter an Order:

- i) granting preliminary approval of the Settlement Agreement attached as Exhibit 1 to the Declaration of Matt Dunn;
- ii) approving the Notice of Class Action Settlement and Settlement Hearing, and the Claim Forms to be issued, attached Exhibit 3 to the Declaration of Matt Dunn;
- iii) setting a final fairness hearing date no earlier than 90 days from preliminary approval; and
- iv) entering the Proposed Order attached as Exhibit 5 to the Declaration of Matt Dunn;

Dated: April 14, 2014
New Paltz, New York

Respectfully submitted,

s/ Matt Dunn

Matt Dunn

Dan Getman

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